

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Lifeline and Link Up Reform and)	WC Docket No. 11-42
Modernization)	
)	
Federal-State Joint Board on Universal)	CC Docket No. 96-45
Service)	
)	
Lifeline and Link Up)	WC Docket No. 03-109

COMMENTS OF CENTURYLINK

Jeffrey S. Lanning
John E. Benedict
CenturyLink
1099 New York Avenue, N.W.
Suite 250
Washington, DC 20001
202-429-3113
jeffrey.s.lanning@centurylink.com
john.e.benedict@centurylink.com

Tiffany West Smink
Counsel for CenturyLink
1099 New York Avenue, N.W.
Suite 250
Washington, DC 20001
303-383-6619
tiffany.smink@centurylink.com

April 21, 2011

EXECUTIVE SUMMARY

CenturyLink supports the Commission's efforts to modify the Lifeline and Link Up programs to reduce and eliminate waste, fraud and abuse, to improve program administration, and to better align the programs with today's telecommunications market. Over the last few years, as many wireless providers (particularly those offering prepaid service) have been added as Lifeline Eligible Telecommunications Carriers (ETCs), the size of the low-income fund has grown dramatically. It is fairly plain that this unsustainable growth is due, at least in part, to failings in the program rules. Consequently, CenturyLink agrees the Commission should take a closer and more comprehensive look at the structure and functioning of the universal service low-income program.

The Commission must be careful when modifying program requirements, however, to avoid creating unnecessary administrative burdens for the Universal Service Administrative Company (USAC) or ETCs. If the Commission is to impose additional administrative obligations, the Commission must ensure that they are necessary, that they substantially aid the Commission's objectives for the program, and that they are tailored to effectively and efficiently accomplish those objectives. Where wireless Lifeline/Link Up offerings differ from those of more traditional wireline carriers, the Commission should modify its low-income program to appropriately address those differences in order to ensure efficient, effective, and compliant use of low-income universal service fund (USF) support.

Addressing the specific issues that the Commission raises in the *NPRM*, CenturyLink believes the Commission should take reasonable steps to contain the size of the low-income fund, especially by reducing waste, fraud, and abuse. Those steps should include (1) an interim process for addressing duplicate claims for Lifeline and Link Up support, (2) eliminating toll

limitation services (TLS) support and the obligation to offer TLS at no cost to Lifeline customers, (3) requiring ETCs to collect some minimum monthly consumer charge for Lifeline service, (4) adopting one notice process for terminating Lifeline benefits, and (5) requiring audits for new ETCs.

But, the Commission should not require ETCs to submit customer-identifying or household-identifying information on their Form 497s. Such a requirement is likely to be very burdensome for ETCs and USAC, without corresponding benefit to the Commission's program goals. Nor should the Commission require USAC to recover funds from ETCs for any period of duplicate claims that is not solely the fault of the ETC. Disgorgement of Lifeline support should be compelled only where an ETC has, by its own knowing conduct, violated program rules. ETCs should not be punished for the misconduct or noncompliance of Lifeline consumers or other ETCs.

The Commission should formally adopt a rule to codify its program policy that Lifeline support is limited to one line per residence. Lifeline subscribers should be advised of the rule when initially applying for the service, and they should be required to certify their compliance when applying and as part of any verification of eligibility. The relevant residence is the customer's primary residential address and should be the physical address of the residence to which the service is tied. There should be some appropriate, limited exceptions to the requirement for certain types of living arrangements, including unrelated adults sharing a residence. Service addresses should be as specific as necessary to properly distinguish living arrangements that might otherwise appear to be the same residence.

The Commission should adopt proposed changes to eligibility for enhanced Lifeline and Link Up services for residents of tribal lands. These include program modifications to: (1) more

clearly reflect the bases for eligibility for enhanced Lifeline and Link Up support for residents of tribal lands; (2) add the Food Distribution Program on Indian Reservations (FDPIR) as a qualifying program for enhanced Lifeline and Link Up support; and (3) adopt a new designation process for those tribal groups and communities seeking designation as tribal lands under the Commission's rules. Also, as proposed, the Commission should continue the self-certification requirement for tribal land residence.

The Commission should take appropriate steps to constrain the size of the low-income fund. However, it should not cap the fund, but should instead specifically address program abuses. The rapid increase in the size of the fund has been closely tied to the rise in Lifeline-only ETCs over the last few years. The Commission should closely examine and understand the Lifeline programs of these new ETCs to best evaluate how to constrain the size of the low-income fund. The Commission should not allow the Lifeline program to draw funding away from or otherwise infringe on the other Universal Service Fund programs, such as the high-cost programs that are and will be essential in bringing broadband to all customers.

To improve administration of the low-income program, CenturyLink endorses several of the Commission's specific proposals. These include: (1) requiring all states to use the federal default states' program eligibility criteria as minimum eligibility criteria, (2) requiring consumers to provide documentation of program eligibility for Lifeline service, (3) modifying the current formula used in federal default states for determining minimum verification sample sizes and applying that formula across all states, (4) encouraging coordinated enrollment as a best practice, and (5) establishing a database of Lifeline subscribers that would be used to verify consumer eligibility, aid or eliminate the need for annual verifications, and prevent duplicate claims. The

Commission, however, should not require that ETCs track or retain each customer's documentation of program eligibility after they join the program.

The Commission should encourage targeted outreach through state agencies and tribal liaisons. It should require ETCs to expressly identify their service as a Lifeline-supported product in their advertising and outreach materials. ETCs should be required to inform consumers about the one-line-per-residence rule, yet permitted the flexibility to determine how to do so. The Commission can develop model language that ETCs could choose to use to inform consumers about the rule, but given the wide range of advertising and outreach media it should not mandate specific language or any particular form of outreach on the rule. The Commission also should revise the definition of Lifeline service so that it is clear that Lifeline ETCs do not need to advertise the enumerated functionalities of section 54.101(a) when advertising their Lifeline services.

Finally, the Commission should explore possible programs that could provide discounts on broadband Internet services for low-income consumers. It should not require participation from providers that have programs of their own. For, example, CenturyLink will also be implementing a broadband adoption program for low-income consumers that the Commission may be able to use to help inform its design of a longer-term universal service program to support broadband Internet service for low-income consumers.

TABLE OF CONTENTS

	Page
EXECUTIVE SUMMARY	I
I. INTRODUCTION.....	1
II. THE COMMISSION SHOULD TAKE APPROPRIATE STEPS TO REDUCE AND ELIMINATE WASTE, FRAUD, AND ABUSE IN THE LOW- INCOME PROGRAM.....	4
A. The Commission should establish an interim process to reduce duplicate claims of Lifeline support.....	4
B. The Commission should not require submission of customer-identifying information on Form 497s or seek recovery of Lifeline support from ETCs with duplicate claims.....	6
C. The Commission should only eliminate TLS support if it also eliminates the requirement that ETCs provide TLS at no charge to Lifeline customers.....	8
D. The Commission should not impose a customer usage requirement on wireline services purchased through recurring periodic payments.....	9
E. The Commission should require ETCs to periodically collect a minimum charge from customers for Lifeline service.....	9
F. The Commission should adopt a uniform 60-day notice process for de- enrolling customers from the Lifeline program or otherwise terminating their Lifeline benefits.....	10
G. The Commission should require audits for new Lifeline ETCs.....	12
III. THE COMMISSION SHOULD MODIFY THE PROGRAM'S CONSUMER ELIGIBILITY RULES.....	12
A. The Commission should formally adopt and make modifications to its requirement that Lifeline support be limited to one-line-per-residence.....	12
B. The Commission should adopt its proposed modifications to eligibility for enhanced Lifeline and Link Up services.....	14
IV. THE COMMISSION SHOULD CONSTRAIN THE SIZE OF THE LOW- INCOME FUND, BUT NOT NECESSARILY BY CAPPING IT.....	15
V. THE COMMISSION SHOULD IMPLEMENT SEVERAL OF ITS PROPOSALS TO IMPROVE PROGRAM ADMINISTRATION.....	16

A.	The Commission should require uniform minimum program eligibility criteria across all states and consumer documentation of program eligibility.	16
B.	The Commission should modify the current formula for determining minimum verification sample sizes.	18
C.	The Commission should encourage coordinated enrollment as a best practice.	20
D.	The Commission should establish a database of Lifeline subscribers.	20
E.	Consumers will still need to provide documentation of eligibility along with electronic signatures.	21
VI.	THE COMMISSION SHOULD ENCOURAGE TARGETED OUTREACH THROUGH STATE AGENCIES AND TRIBAL LIAISONS AND REQUIRE CLEAR IDENTIFICATION OF LIFELINE SERVICES.	22
VII.	THE COMMISSION SHOULD PURSUE PILOT PROGRAMS FOR PROVIDING DISCOUNTED BROADBAND INTERNET SERVICE TO LOW-INCOME CUSTOMERS.	24
VIII.	CONCLUSION.	25

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Lifeline and Link Up Reform and)	WC Docket No. 11-42
Modernization)	
)	
Federal-State Joint Board on Universal)	CC Docket No. 96-45
Service)	
)	
Lifeline and Link Up)	WC Docket No. 03-109

COMMENTS OF CENTURYLINK

I. INTRODUCTION.

CenturyLink is an Eligible Telecommunications Carrier (ETC) providing Lifeline and Link Up services to more than 450,000 low-income customers in 37 states. This includes providing enhanced Lifeline and Link Up services to approximately 2,000 residents of tribal lands throughout our service territory. Given this involvement with the Commission's universal service low-income program, CenturyLink appreciates the opportunity to file these comments on the Federal Communications Commission's *Notice of Proposed Rulemaking (NPRM)*,¹ and supports the Commission's efforts to reduce and eliminate waste, fraud, and abuse of the program, to improve program administration, and to better align the program with today's telecommunications market.

The Commission must be careful, however, not to impose significant, and unreasonable, additional administrative burdens on ETCs and the Universal Service Administrative Company

¹ *In the Matter of Lifeline and Link-Up Reform and Modernization; Federal State Joint Board on Universal Service; Lifeline and Link Up*, WC Docket No. 11-42, CC Docket No. 96-45, WC Docket No. 03-109, Notice of Proposed Rulemaking, FCC 11-32 (rel. Mar. 4, 2011).

(USAC) that may do little to further the Commission’s low-income program objectives. Several of the Commission’s proposals pose this risk. Additional data collection, overly broad tracking requirements, and extensive reporting obligations would impose significant additional administrative cost without demonstrably advancing universal service for low-income customers or substantially reducing waste, fraud or abuse of the program. ETCs are private service providers and should not be tasked with making eligibility determinations or enforcing program compliance of customers and other ETCs. State agencies that administer the underlying qualifying programs are better suited to determining and verifying consumer program eligibility. And, while ETCs are responsible for their own compliance with program requirements, enforcing the program compliance of others is fundamentally the Commission’s role as the public entity responsible for establishing and administering the program. Commission proposals that impose these tasks on ETCs should be re-evaluated and either dropped or reformulated to better advance the Commission’s low-income program goals without placing excessive burdens on ETCs to administer the program.

The Commission has recognized that over the last ten years Lifeline and Link Up support has essentially doubled in size to more than \$1.3 billion in annual support.² Over the last few years, wireless carriers – including pre-paid wireless carriers – have been added to the ranks of ETCs providing Lifeline and Link Up services. In just the last three years Lifeline and Link Up support has grown significantly.³ To some degree this data reflects the success wireless carriers

² *Id.* ¶ 3.

³ *See, e.g.*, GAO 11-11, Report to Congressional Requesters, “Telecommunications, Improved Management Can Enhance FCC Decision Making for Universal Service Fund Low-Income Program, Oct. 2010, at 14-15. Additionally, the compound annual growth rate per year of the total low-income support payments from 2000 to 2008 was slightly less than 6% per year

have had in providing low-priced, mobile telephone services for low-income consumers. Yet, this may also reflect different implementation of program requirements by wireless carriers, when compared to the more traditional wireline providers, and the failed application of program rules that are not suited to new technologies and platforms, nor to today's more competitive telecommunications market. Accordingly, the Commission should take a closer and more comprehensive look at the structure and functioning of the universal service low-income program.

CenturyLink finds that it is impractical to address all of the *NPRM's* questions, because there is insufficient public information about how pre-paid wireless carriers are implementing their Lifeline programs and seeking reimbursement from USAC. To the extent that wireless Lifeline/Link Up programs differ from those of more traditional wireline carriers, CenturyLink believes that the Commission needs to modify its universal service fund (or USF) low-income programs to appropriately address those differences to ensure efficient, effective and compliant use of low-income USF support. The Commission should be careful that in modifying its rules and policies, it does not impose significant additional administrative burdens on wireline carriers in implementing their Lifeline programs, when those additional obligations will not result in any additional efficiencies for those programs. The Commission should carefully tailor its modifications to ensure that any additional administrative burdens are genuinely necessary and cost-effective. Neither USAC nor ETCs should be saddled with additional administrative obligations that do not significantly benefit the Commission's low-income program objectives.

compared to a per year growth rate from just 2008 to 2010 of almost 26%. *See Universal Service Monitoring Report*, CC Docket No. 98-202, prepared for the Federal-State Joint Board on Universal Service in CC Docket No. 96-45 at Table 2.2., http://www.fcc.gov/Daily_Releases/Daily_Business/2010/db1230/DOC-303886A4.pdf; *NPRM* ¶ 3 & n. 9.

II. THE COMMISSION SHOULD TAKE APPROPRIATE STEPS TO REDUCE AND ELIMINATE WASTE, FRAUD, AND ABUSE IN THE LOW-INCOME PROGRAM.

The low-income program, like all of the other universal service programs, receives its funding from the overall universal service fund. The USF is sustained by the mandated contributions of telecommunications providers that recover these contribution costs from their end users. Because the low-income program is not capped, as the demands on the low-income fund increase, so do the demands on the overall USF. Increases in the size of the low-income fund contribute to increased costs of telephone service for the average consumer.

To counter this effect, the Commission should take reasonable steps to contain the size of the low-income fund especially by reducing waste, fraud, and abuse. Those steps should include (1) an interim process for addressing duplicate claims for Lifeline and Link Up support, (2) eliminating toll limitation services (TLS) support and the obligation to offer no-cost TLS to Lifeline customers, (3) requiring ETCs to collect some minimum monthly consumer charge for Lifeline service, (4) adopting one notice process for terminating Lifeline benefits, and (5) requiring audits for new ETCs.

A. The Commission should establish an interim process to reduce duplicate claims of Lifeline support.

The Commission has expressed understandable concern that there is evidence of a significant incidence of more than one ETC providing Lifeline service to the same individual or different individuals residing at the same address. Commission policy appropriately has been that Lifeline support is limited to one line per residence.⁴ To improve compliance and enable

⁴ This program policy is also referred to as the “one-line-per-household” or the “one-per-household” policy. For consistency, CenturyLink refers to it as the “one-line-per-residence” policy throughout these comments.

more effective enforcement of the one-line-per-residence policy, the Commission should explicitly adopt a rule to that effect.

Equally important, it should also establish a mechanism or process by which requests for Lifeline support for a residence that is already receiving Lifeline support can be identified and declined before any additional Lifeline support is provided. The Commission should also better inform low-income consumers about this program requirement and be clear about which telecommunications service offerings are subject to this rule. Additionally, consumers applying for Lifeline services should be required to certify under penalty of perjury that neither they nor anyone else at their residence is receiving Lifeline service. If the Commission concludes that these measures alone are not sufficient to effectively minimize duplicate claims for Lifeline support, the Commission should establish a database that enables providers to determine an individual's eligibility for Lifeline service in accord with the one-line-per-residence requirement. Because today there are multiple providers that can offer Lifeline service to the same residence, there is little any one provider can do to ensure compliance with this rule. Without a database, a provider can do little more than inform customers of the rule and ask the customer to certify compliance.

Until it can implement a database to enable more effective enforcement, the Commission has proposed certain more immediate measures to promote better consumer compliance with the one-line-per-residence policy. CenturyLink has been working with an industry group that has proposed an interim process for addressing existing duplicate claims, and supports that proposal.⁵

⁵ *Ex Parte Notice* from CenturyLink, *et al.* to Ms. Marlene Dortch, FCC, dated Apr. 15, 2011, WC Docket No. 11-42, CC Docket No. 96-45 and WC Docket No. 03-109, and appended Interim Lifeline Duplicate Resolution Process proposal and proposed rules.

CenturyLink will not repeat that proposal here, but it encourages the Commission to adopt the group's consensus recommendation.

B. The Commission should not require submission of customer-identifying information on Form 497s or seek recovery of Lifeline support from ETCs with duplicate claims.

CenturyLink will comment on some noteworthy additional measures that the Commission has proposed to assist in detecting duplicate claims. The Commission proposes to require ETCs to provide information such as customer names, addresses, social security numbers, birthdates, or other unique household-identifying information to USAC on their Form 497s in order to assist in detecting duplicate claims.⁶ Requiring this information with submission of the Form 497s would be very burdensome for ETCs and USAC, likely without corresponding benefit to the Commission's program goals.

Currently, CenturyLink does not submit its Form 497s confidentially, but provision of customer-identifying information as proposed by the Commission would require it to do so. Additionally, CenturyLink files Form 497s monthly and it currently has more than 450,000 Lifeline customers. Providing customer-identifying information on a monthly basis for so large a volume of customers would be needlessly tedious and very expensive. CenturyLink expects that if USAC were receiving similar volumes of monthly data from other ETCs, it would be a daunting task for USAC to compare the data to identify duplicate claims.

Further, providers do not always require customers' social security numbers or birthdates. Indeed, some states specifically use state identification numbers for Lifeline-eligible consumers precisely to avoid reliance on social security numbers. And, customers may not want to provide

⁶ *NPRM* ¶ 56.

this information to providers to obtain Lifeline service. Consequently, requiring that ETCs provide this information to USAC would require carriers like CenturyLink to modify their service ordering processes to obtain information from their low-income customers that they do not otherwise require from their customers, that in some cases would conflict with state requirements that prohibit collecting that information, and may deter customers who do not want to provide this information from enrolling in the program. It would also be pointlessly expensive for carriers, and likely irritating to customers, to require ETCs to collect social security numbers from current low-income customers. Given these problems, the Commission should not require customer-identifying and household-identifying information to be submitted on ETCs' Form 497s.

The Commission also proposes that USAC be required to seek recovery for funds from all ETCs with duplicates for the applicable period -- *i.e.*, if one or more individual residing at the same address have been obtaining Lifeline support from two or more providers simultaneously, USAC would be required to seek recovery from all implicated providers for all support received during the period of duplicative service. The Commission proposes to define the applicable period as the period beginning at the time a duplicate is identified until the time at which it can be demonstrated that the consumer or household is no longer receiving duplicate benefits.⁷

This suggestion is misguided. In the absence of a national database, the best an ETC can do to try to avoid duplicate applications is to inform customers about the one-line-per-residence rule and obtain certifications that there are no other Lifeline supported telephones at their address. Incidences of duplicate support, especially across providers, are not within any ETC's

⁷ NPRM ¶ 62.

control, nor should they be. ETCs should not have to police their customers or the conduct of other ETCs, nor are they realistically able to do so. Although this proposal would not require disgorgement of Lifeline support until the duplicate is identified, it would unreasonably penalize ETCs that have taken appropriate steps to comply with program requirements within the current framework. Disgorgement of Lifeline support should be required only where an ETC has, by its own knowing conduct, violated program rules. ETCs should not be punished for the misconduct of consumers or other ETCs.

CenturyLink supports the Commission's proposal to require ETCs to collect the residential addresses of Lifeline and Link Up applicants before they provide the discounted services. Applicants should be required to provide their primary residential address as the address to which any Lifeline service will be tied.

C. The Commission should only eliminate TLS support if it also eliminates the requirement that ETCs provide TLS at no charge to Lifeline customers.

The Commission's rules allow ETCs compensation for the costs of offering TLS at no charge to eligible low-income consumers. ETCs' cost recovery for providing TLS to Lifeline consumers is based on the costs that ETCs would otherwise not incur if they did not provide TLS to a given customer. The Commission proposes to eliminate this support or adopt a flat amount for reimbursement. CenturyLink supports the Commission's proposal to eliminate TLS support provided that the obligation to offer TLS at no charge to Lifeline customers is also removed. ETCs should be permitted to offer TLS at no charge to Lifeline customers, if they so choose. But, they should not be subject to an unfunded mandate to do so.

D. The Commission should not impose a customer usage requirement on wireline services purchased through recurring periodic payments.

The Commission proposes to prohibit ETCs from seeking Lifeline support for any Lifeline customer who has not used the service for sixty consecutive days. If the Commission imposes such a rule it should not apply to any wireline service for which customers pay on a periodic basis. Wireline carriers routinely provide basic flat-rated unlimited local service for a periodic fee. They are not in a position to monitor and track individual customer use of that service. Moreover, this rule is counter to the very purpose of a “Lifeline” service, which is to ensure that a telephone connection is available when the customer needs it. If a low-income customer is paying a periodic fee for the service, such as a monthly bill charge, this should be sufficient to justify Lifeline reimbursement so long as the customer remains otherwise eligible for the support.

E. The Commission should require ETCs to periodically collect a minimum charge from customers for Lifeline service.

The Commission should adopt a rule requiring all ETCs in all states to collect some minimum monthly amount from participating households for Lifeline service.⁸ This rule also should apply to enhanced Lifeline service for customers residing on tribal lands. All Lifeline customers should be required to pay some periodic amount for the service to help ensure that customers receiving the service actually need the service and are not obtaining the service simply because it is “free.” Failing to require any payment simply invites waste and abuse.

⁸ This would not mean that the amount must be collected each month, but that the amount should be collected on a periodic basis that reflected that the requisite minimum monthly amount was collected. Thus, if an ETC billed its customers quarterly and the monthly minimum amount was \$2, the ETC would need to bill and collect \$6 to satisfy the requirement.

F. The Commission should adopt a uniform 60-day notice process for de-enrolling customers from the Lifeline program or otherwise terminating their Lifeline benefits.

The Commission proposes to require ETCs to de-enroll Lifeline customers or households from the program when: (1) the subscriber is receiving duplicate support and fails to select one ETC in the allotted time after being notified of a duplicate claim; (2) the subscriber does not use the Lifeline-supported service for 60 days and fails to confirm continued desire to maintain the service; or (3) the customer does not respond to the eligibility verification survey. Under the proposed rules, subscribers would receive notice that they could be de-enrolled from the program if they did not take action by a specified date.

The current Lifeline rules require that ETCs give customers 60-days' notice prior to terminating their Lifeline benefits when an ETC has "a reasonable basis to believe that the subscriber no longer meets the Lifeline-qualifying criteria[.]"⁹ The de-enrollment scenarios outlined in the *NPRM* are additional situations in which a customer's Lifeline discounts should be discontinued. It would be administratively easier to maintain the same notice period for all situations requiring termination of Lifeline benefits. Since there is already a 60-day notice period in place for terminating Lifeline benefits in certain situations, it would be most practical to apply that same time period across the board. Systems and processes are already in place in accord with this 60-day termination notice requirement. For the first and third scenarios, the

⁹ 47 C.F.R. § 54.405(c).

notice period can run from the time that the customer is notified of the duplicate claim and from the time the request to verify eligibility is made.¹⁰

In reviewing the proposed rule language in the *NPRM* Appendix for 47 C.F.R. § 54.405(e) it appears that the Commission is proposing a 30-day notice period for the three scenarios described above during which ETCs are not to seek Lifeline reimbursement for the notified customer. CenturyLink is concerned that requiring ETCs to halt Lifeline service before expiration of the notice period could be an administrative nightmare for providers, and could be unfair to consumers. If an ETC is going to discontinue Lifeline benefits, it should be because under the rules the customer is not eligible for Lifeline service. An ETC should not be required to stop Lifeline benefits simply because the customer “might” be ineligible, and then have to resume eligibility and potentially be asked to provide credits for the period the customer was de-enrolled because it was determined later that the customer remained eligible. Such a requirement would impose a need to generate manual credits and likely a need to file revised Form 497s every month. This would be a significant additional administrative burden for ETCs and USAC. ETCs need to be able to receive Lifeline support and provide the discounted service to customers until the notice period expires and the customer is removed from the program.¹¹

Also, with respect to de-enrollment, where more than one individual residing at the same address is receiving Lifeline support (*i.e.*, each is eligible to receive Lifeline service, but only one may receive the service due to the one-line-per-residence rule), the Commission should

¹⁰ For the reasons discussed in Section II.D., *supra*, the Commission should not impose a customer usage requirement on wireline service paid for on a regular, periodic basis. In turn, the second de-enrollment scenario should not apply to wireline carriers such as CenturyLink.

¹¹ Also, to be clear, under no circumstances should ETCs be required to provide Lifeline service without being able to seek reimbursement for providing that service.

clarify which individual an ETC must de-enroll and how an ETC is to inform its customer(s) of the situation.

G. The Commission should require audits for new Lifeline ETCs.

The Commission should require all new ETCs to be audited after their first year of providing Lifeline service. Many of the new ETCs for the Lifeline program are becoming ETCs only for the purpose of providing Lifeline service, are receiving waivers from or forbearance of certain universal service rules to do so, and are providing the service in a manner that is different from the type of service envisioned when the program rules were first adopted. In turn, it should aid efficient administration of the program to confirm early on that these ETCs are providing Lifeline service in accord with program requirements.

The Commission should not require ETCs participating in the program to engage independent firms to assess their compliance with program requirements. This would be yet another improper administrative burden for ETCs, while providing no mechanism for cost-recovery. The Commission should have sufficient investigative and audit authority of its own and the resources necessary to address these issues for the program.

III. THE COMMISSION SHOULD MODIFY THE PROGRAM'S CONSUMER ELIGIBILITY RULES.

A. The Commission should formally adopt and make modifications to its requirement that Lifeline support be limited to one-line-per-residence.

If the Commission retains the one-line-per-residence approach, then it should adopt a rule that explicitly limits Lifeline and Link Up support to one Lifeline discount and one Link Up discount per residential address. Lifeline subscribers should be required to initially certify when applying for service, and as part of any verification of eligibility, that they are receiving Lifeline support for only one line at only one residential address which is their primary

residential address. Further, they should be required to certify that to the best of their knowledge no one else is receiving Lifeline support at that same address, or that they qualify for one of the express exceptions to the one-line-per-residence rule (and they should indicate for which exception they qualify). In the case of P.O. boxes, the relevant address for purposes of the rule should be the physical address of the residence to which the service is tied.

There should be some appropriate exceptions to the one-line-per-residence rule for certain types of living arrangements including unrelated adults sharing a residence. Also, service addresses should be as specific as necessary to properly distinguish living arrangements that may otherwise appear to be the same residence. Thus, for instance, a house that has a basement apartment should be able to be considered two separate residences for purposes of the rule. Similarly, consumers that are eligible for Lifeline support should be entitled to that support even if they are living in commercially-zoned buildings or group living arrangements, and there should be sufficiently distinct service addresses to accommodate more than one consumer being eligible for support in such buildings.

Based on CenturyLink's experience with Lifeline service in tribal areas to date there is no need to apply the one-line-per-residence rule any differently in tribal areas. The rule should be applied and enforced equally for all areas.

CenturyLink is concerned, however, that in the proposed rules in the *NPRM* Appendix the Commission uses the language of one discount per "billing residential address" and requires that the consumer certify at enrollment that this address is her primary residential address.¹² "Billing" residential address may be problematic. CenturyLink recommends that the language

¹² See *NPRM* Appendix proposed rule 47 C.F.R. § 54.408(a).

be one discount per “service residential address”, as the “billing residential address” may not be the address where the eligible consumer resides and the service is being provided (at least for wireline carriers). This can be the case where a disabled individual has assistance in paying their bills from another family member or caregiver that does not live with them. The Commission should not automatically preclude Lifeline eligibility if the billing address is not the primary residence of the eligible consumer.

B. The Commission should adopt its proposed modifications to eligibility for enhanced Lifeline and Link Up services.

CenturyLink supports the Commission’s proposals to amend its rules to (1) more clearly reflect the bases for eligibility for enhance Lifeline and Link Up support for residents of tribal lands; (2) add the Food Distribution Program on Indian Reservations (FDPIR) as a qualifying program for enhanced Lifeline and Link Up support, and (3) adopt a new designation process for those tribal groups and communities seeking designation as tribal lands under the Commission’s rules. If that proposal is adopted, however, once the new process is implemented, the Commission should maintain a list of tribal lands approved under this process, similar to the “near reservation” list that the Commission provided in the *Second Tribal Order*.¹³

As it has proposed, the Commission should require all consumers requesting Lifeline and Link Up services, including tribal residents requesting enhanced Lifeline and Link Up services, to provide proof of income or participation in a qualifying program in order to receive the services in the first instance.

¹³ See *In the Matter of Federal-State Joint Board on Universal Service, Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas*, Twenty-Fifth Order on Reconsideration, Report and Order, Order, and Further Notice of Proposed Rulemaking, FCC 03-115, 18 FCC Rcd 10958, 10986-95, Appendix B (2003).

CenturyLink also supports the Commission's proposal to maintain the self-certification requirement as to tribal land residence. The Commission should clarify that receipt of a self-certification of residence on tribal lands, along with documentation of income or participation in an eligible program, is sufficient documentation for an ETC to provide enhanced Lifeline support.

IV. THE COMMISSION SHOULD CONSTRAIN THE SIZE OF THE LOW-INCOME FUND, BUT NOT NECESSARILY BY CAPPING IT.

CenturyLink shares the Commission's concern about the recent rapid growth in the size of the low-income fund, and agrees that steps need to be taken to constrain the fund's growth. Nevertheless, capping the fund is not necessarily the best solution to the problem. There are many indications that some of the growth may be due to duplicate claims of support, especially as wireless ETCs have expanded their Lifeline business.

To the extent that growth of the fund is due to illegitimate uses of program funds, the solution should not be to simply cap the fund, but instead should be to tackle waste and abuse head on, as the Commission is now proposing to do. Capping the fund without specifically addressing program abuses would only serve to perpetuate illegitimate support and potentially deny support to compliant low-income consumers with legitimate need for the support. Given that the rapid increase in the size of the fund has been closely aligned with the rise in Lifeline-only ETCs – ETCs that have been designated by the Commission just during the last few years – the Commission should closely examine and understand the Lifeline programs of these new ETCs to best evaluate how to constrain the size of the low-income fund. In any event, the Commission must not allow the Lifeline program to draw funding away from or otherwise

infringe on the other Universal Service Fund programs, such as the high-cost programs that are and will be essential in bringing broadband to all customers.

V. THE COMMISSION SHOULD IMPLEMENT SEVERAL OF ITS PROPOSALS TO IMPROVE PROGRAM ADMINISTRATION.

The *NPRM* offers a variety of proposals for improving administration of the low-income program. Several of those proposals should be adopted. They include (1) requiring all states to use the federal default states' program eligibility criteria as minimum eligibility criteria, (2) requiring consumers to provide documentation of program eligibility for Lifeline service, (3) modifying the current formula used in federal default states for determining minimum verification sample sizes and applying that formula across all states, (4) encouraging coordinated enrollment as a best practice, and (5) establishing a database of Lifeline subscribers that would be used to verify consumer eligibility, aid or eliminate the need for annual verifications, and prevent duplicate claims. CenturyLink encourages the Commission to adopt each of these improvements.

A. The Commission should require uniform minimum program eligibility criteria across all states and consumer documentation of program eligibility.

CenturyLink supports the Commission's proposal to require all states to use, at a minimum, the program eligibility criteria currently used by federal default states, but to allow states to maintain existing state-specific eligibility criteria that supplement the federal criteria. Standard minimum criteria should enable easier program administration across multiple states.

Requiring consumers to provide documentation of program eligibility for Lifeline service should be a positive change for the program. But, tracking the basis of each customer's eligibility for Lifeline after that original determination would be administratively difficult and

expensive, with little subsequent program benefit. In the *NPRM* (see proposed 47 C.F.R. § 54.410(d)(2)) the Commission proposes that as part of verifications that ETCs

. . . shall submit data to the Commission and Administrator regarding consumer qualifications for eligibility, including program-based and income-based eligibility, the number of customers that qualify based on income and program participation, the number of subscribers that qualify for each eligible program, the number of non-responders, and the number of customers de-enrolled and in the process of being terminated or de-enrolled. [ETCs] shall submit each customer name, address, and number of individuals in the customer's residence for those customers qualifying based on income criterion.¹⁴

It is unreasonable to require that this data be obtained and then indefinitely tracked for each Lifeline customer. Further, the Commission should not compel ETCs to retain the customer's proof of program eligibility. Instead, as with the current rules regarding proof of income eligibility, the Commission should make clear that ETCs need not retain program eligibility documentation.

The Commission also should make clear how the requirement that consumers provide proof of program eligibility is to be applied in states where a state agency (or other state-appointed non-ETC entity) makes the eligibility determinations. In those states ETCs must follow each state's requirements and should not otherwise need to obtain any documentation of eligibility from Lifeline customers that were identified as eligible by the state agency. The Commission also should clarify how this rule would apply where a state expressly requires Lifeline providers to accept customer self-certifications of eligibility and prohibits Lifeline providers from requesting proof-of-eligibility documentation.

Overall, requiring Lifeline customers to provide proof of program eligibility could benefit the program by improving consumers' compliance. Nevertheless, the Commission should ensure

¹⁴ *NPRM* Appendix proposed rule 47 C.F.R. § 54.410(d)(2).

that it implements the proposed rule without creating significant additional administrative burdens for ETCs or for other entities that assess consumer eligibility.

The Commission also proposes to require that consumers notify their Lifeline provider within 30 days if they have knowledge that they no longer qualify for Lifeline program support. It is unclear to CenturyLink whether this proposed requirement would be useful. CenturyLink questions how the Commission intends to enforce the requirement and what, if anything, would be done if the customer fails to provide the notice. In CenturyLink's experience customers rarely provide any such notice today. Consequently, CenturyLink relies on other means, such as the annual verification process and notifications from state agencies, to identify existing Lifeline customers that are no longer eligible.

B. The Commission should modify the current formula for determining minimum verification sample sizes.

The Commission proposes to establish a uniform methodology for all states to use in determining minimum verification sample sizes and offers two alternative proposals. The first is a sample-and-census proposal, which would allow an ETC to sample its customers so long as the rate of ineligibility among responders to the survey is below a fixed threshold. If that ineligibility rate exceeds the threshold, the ETC would be required to take a census of all of its Lifeline customers. The second proposal would simply modify the current formula used in the federal default states and apply it uniformly to all states.

CenturyLink supports the latter approach. Moving to a sample-and-census approach could create an unduly burdensome, expensive process for ETCs serving large numbers of Lifeline customers whenever a census is triggered. Additionally, where an ETC has to perform a census and rely solely on customer responses to determine eligibility, it may well be that a large

number of customers will be de-enrolled from the program even though they are eligible simply because they fail to timely respond to the verification request. It is important not only that the verification process be a useful tool for minimizing waste in the program, but also that it not hinder the goal of universal access to affordable telephone service by unnecessarily removing many eligible low-income consumers.

This is another reason why state agency involvement in the eligibility and verification processes is needed to more effectively administer the program. A state agency can potentially verify a consumer's eligibility for the Lifeline program without relying on a response from the consumer by checking whether the consumer remains eligible for an underlying qualifying program. This likely reduces unnecessary customer churn for non-responding customers, and it enables an ETC to more appropriately and efficiently target its customer verification notices to those customers who appear to be no longer eligible for the Lifeline program.

Instead of adopting a sample-and-census approach, the Commission should modify the current formula for determining the verification sample sizes. The current formula creates too small of a verification sample size for ETCs with large numbers of Lifeline subscribers. The Commission should modify the current formula so that it results in more robust sample sizes for larger volumes of Lifeline subscribers. The Commission also should ensure that, if it adopts any uniform sampling methodology to be used by all states, the system works with existing state processes. The Commission should not override strong verification processes that many states have already implemented.

The Commission also proposes to require all states to submit verification sampling data to USAC. It is not clear whether or how all states would have verification sampling data. In federal default states, ETCs perform the annual verification process. In states that have their

own Lifeline programs, potentially an ETC, a state agency, a third party, or some combination thereof, would have the relevant verification sampling data. The Commission should clarify its proposal before it adopts any such requirement.

C. The Commission should encourage coordinated enrollment as a best practice.

The Commission has described coordinated enrollment as a mechanism that allows consumers to enroll in the Lifeline and Link Up programs at the same time they enroll in a qualifying public assistance program while requiring eligible consumers to affirmatively choose to enroll in the Lifeline program. CenturyLink supports coordinated enrollment as the optimal method for enrolling eligible consumers in the Lifeline program. CenturyLink agrees with the Joint Board and the Commission that coordinated enrollment should be encouraged as a best practice by the states. This approach enables a consumer to quickly and conveniently choose to enroll in the program immediately when eligible. Even if a consumer chooses not to enroll at that time, states should be encouraged to provide eligible consumers at the time they are enrolling in an qualifying program with information regarding Lifeline services and the providers in the state offering those services. In this manner, eligible consumers would quickly be informed about the program and have information for enrolling when they so chose. Outreach and enrollment in this manner is particularly well targeted to consumers eligible for Lifeline and Link Up services.

D. The Commission should establish a database of Lifeline subscribers.

The Commission proposes to establish a national database of Lifeline subscribers that would be used to verify consumer eligibility, track verification, and check for duplicate service subscriptions. It seems increasingly inevitable that to sufficiently protect the integrity of the Lifeline program, a database of Lifeline subscribers should be created. A well-designed and

well-run database should (1) help to streamline enrollment by simplifying eligibility verification, (2) help to reduce, if not eliminate, the need for annual verifications processes, and (3) be the most effective mechanism to address the problems of duplicate Lifeline claims. Ultimately, a database likely would prove cost effective by generating savings for the low income program fund greater than the cost of developing and maintaining the database.

At a minimum a database should enable ETCs to check in real time whether a potential customer is eligible for Lifeline service and is not already receiving service from another provider. It should also be designed to enable ETCs to cross-check addresses to confirm that the consumer is eligible for Lifeline service consistent with the one-line-per-residence rule and to verify that Link Up support is only being provided once per address per eligible consumer. State agencies that determine consumer eligibility should be permitted and encouraged to populate the database with the relevant information of eligible consumers. To the extent some states have already created Lifeline customer databases, any national database should be designed to work in conjunction with those databases.

The database should be funded either through government funds appropriated for that purpose or through some other general funding mechanism. It should not be funded through fees on ETCs for database usage. The Commission should want to encourage, not discourage, use of the database.

E. Consumers will still need to provide documentation of eligibility along with electronic signatures.

The Commission proposes to allow consumers to electronically sign the “penalty of perjury” requirements for certification and verification of eligibility. The Commission also seeks comment on whether an interactive voice response telephone system, which records and saves by

phone an applicant's certification of eligibility, satisfies the signature requirement of the rules – such that an applicant could be enrolled over the telephone. Each approach is potentially reasonable for satisfying a signature requirement. In each instance, however, a consumer will still need to provide documentation of eligibility in some manner before receiving Lifeline service.

VI. THE COMMISSION SHOULD ENCOURAGE TARGETED OUTREACH THROUGH STATE AGENCIES AND TRIBAL LIAISONS AND REQUIRE CLEAR IDENTIFICATION OF LIFELINE SERVICES.

CenturyLink believes that outreach through state agencies that are administering the underlying qualifying programs is a highly efficient and cost-effective way to inform those who are eligible for Lifeline service about the program and enhance their enrollment in the program. State agency outreach combined with coordinated enrollment is optimally targeted to consumers eligible for the Lifeline program.

With respect to the enhanced Lifeline and Link Up services for residents of tribal lands, CenturyLink has observed a positive correlation between working directly with tribal liaisons to provide information about its enhanced Lifeline and Link Up services and success with customers subscribing to those services. Tribal liaisons are individuals within the tribal community who work with CenturyLink to distribute information about and applications for our enhanced Lifeline and Link Up services. Tribal liaisons also help CenturyLink to make contacts with tribal newspapers and magazines so that CenturyLink can place appropriate advertisements about its enhanced services in those media. Tribal liaisons have been a more effective conduit for promoting outreach activities on tribal lands as compared to CenturyLink's ability to engage in productive outreach on tribal lands without a tribal liaison.

CenturyLink agrees with the Commission's proposal to require ETCs to expressly identify their service as a Lifeline-supported product in advertising and outreach to consumers. Having ETCs clearly identify their Lifeline-supported services as such should help consumers understand which services are subject to the one-line-per-residence rule. In turn, this may reduce the incidence of duplicate claims.

At the same time, ETCs should not be required to include in all marketing and advertising materials for Lifeline-supported offerings clear and prominent language explaining that consumers are entitled to only one Lifeline subsidy per residence. ETCs should be required to inform consumers about the one-line-per-residence rule, but they should be permitted reasonable flexibility to determine how most appropriately to do so. The Commission can develop model language that ETCs could choose to use, but the language should be suggested and not required. Marketing and advertising materials can take a variety of forms. ETCs need flexibility to take advantage of those varied formats to best reach their target audience. As long as the customer is made aware of the one-line-per-residence rule before enrolling in the program, that should satisfy the ETCs' obligations for outreach on that issue. No particular form of outreach on the one-line-per-residence rule should be mandated.

The Commission has asked that ETCs provide them with the language they currently use to describe their Lifeline and Link Up service offerings. CenturyLink provides some examples of its outreach materials in Attachment 1 to these comments.¹⁵

CenturyLink supports the Commission's proposal to amend the definition of "Lifeline" in section 54.401 to provide support for a set of defined functionalities known as "voice telephony

¹⁵ See Attachment 1, hereto.

service.” CenturyLink particularly supports altering the definition such that it is clear that Lifeline providers do not need to advertise the enumerated functionalities of section 47 C.F.R. § 54.101(a) when advertising their Lifeline services. Requiring ETCs to advertise each of these elements of their telephone service as part of their general advertising is impractical. It serves no useful purpose for anyone -- customer, potential customer, or carrier -- to require carriers to advertise that their telephone service includes, for example, “dual tone multi-frequency signaling or its functional equivalent.” The better interpretation is that ETCs are required to advertise the basic telephone service that incorporates these services and functionalities and the cost of that service.

VII. THE COMMISSION SHOULD PURSUE PILOT PROGRAMS FOR PROVIDING DISCOUNTED BROADBAND INTERNET SERVICE TO LOW-INCOME CUSTOMERS.

CenturyLink agrees that the Commission should explore possible programs that could provide discounts on broadband services for low-income consumers. The Commission should not, however, require participation from providers that have their own programs. To promote adoption and use of broadband service by low-income consumers, CenturyLink has committed to implement a broadband adoption program for eligible low-income consumers.¹⁶ The program has three components: (1) a monthly discount on broadband Internet service; (2) a one-per-household discount on computer equipment for accessing the Internet; and (3) a comprehensive customer education, broadband promotion, and customer training program targeted to qualifying customers. These components are designed to meet three goals: (1) reducing cost barriers for

¹⁶ See *In the Matter of Applications filed by Qwest Communications International Inc. and CenturyTel, Inc., d/b/a CenturyLink for Consent to Transfer Control*, Memorandum Opinion and Order, WC Docket No. 10-110, FCC 11-47, rel Mar. 18, 2011 ¶ 37 and Appendix C, Section II.

qualifying customers; (b) addressing the lack of computer equipment among qualifying customers; and (c) improving education, promotion and training as to the availability and uses of broadband. CenturyLink will report semi-annually to the Wireline Competition Bureau on the progress of the program. In this manner, in addition to the pilot programs that the Commission implements, CenturyLink's program may be used to inform the design of a longer-term universal service program to support broadband service for low-income customers.

VIII. CONCLUSION.

The Commission should take care to reform the universal service low-income program to achieve program objectives while minimizing administrative burdens of the program and rationally constraining the size of the low-income fund.

Respectfully submitted,

CENTURYLINK

Jeffrey S. Lanning
John E. Benedict
1099 New York Avenue, N.W.
Suite 250
Washington, DC 20001
202-429-3113
jeffrey.s.lanning@centurylink.com
john.e.benedict@centurylink.com

By: /s/ Tiffany West Smink
1099 New York Avenue, N.W.
Suite 250
Washington, DC 20001
303-383-6619
tiffany.smink@centurylink.com

Its Attorney

April 21, 2011

ATTACHMENT 1



More ways to save

Get a phone. Stay in touch. Save money.

Lifeline & Link-Up: Giving you the phone connection you need.

If you're on a limited income, you can save on a phone connection with Lifeline and Link-Up. These federal assistance programs can help you get a phone connection and save on your monthly local phone service.

CenturyLink is committed to enhancing the lives of those around us in a meaningful way. We deliver leading technologies that keep people and businesses connected and enrich the communities we serve.

Call 1.800.366.8201 or visit www.centurylink.com/lifeline



CenturyLink™
Stronger Connected™

Get connected with Link-Up. Start saving on your phone bill with Lifeline.

**If you are enrolled in one of these programs, or meet these criteria,
you may qualify for Lifeline and/or Link-Up:**

- Medicaid
- Supplemental Nutritional Assistance Program (SNAP or food stamps)
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance
- Low-Income Home Energy Assistance Program (LIHEAP)
- Head Start
- National School Lunch's Free Lunch Program
- Temporary Assistance to Needy Families (TANF)
- Household annual gross income at or below 135% of the federal poverty level

**You may also qualify for additional enhanced Lifeline and Link-Up
support if you live on American Indian or Alaskan Native tribal
lands and receive support from:**

- Bureau of Indian Affairs General Assistance
- Tribally Administered Temporary Assistance to Needy Families

**Call 1.800.366.8201 or visit
www.centurylink.com/lifeline**



CenturyLink™
Stronger Connected™

Lifeline and Link-Up are available to qualifying consumers in every U.S. state (territory and commonwealth). Qualifications for participation vary by state. States with their own programs have their own criteria. In states that rely solely on the federal program, the subscriber must participate in one of the following programs: Medicaid, food stamps, Supplemental Security Income (SSI), Federal Public Housing Assistance or the Low-Income Home Energy Assistance Program (LIHEAP), Head Start, the National School Lunch's Free Lunch Program, Temporary Assistance to Needy Families (TANF) or must have a Household annual gross income at or below 135% of the federal poverty level. The amount of the discounts also varies by state. Link-Up helps qualified low-income consumers to connect to the telephone network. This federal program offsets 1/2 of the initial hook-up fee, up to \$30, for qualified households. Residents of American Indian and Alaskan Native tribal lands may qualify for an additional \$25 of enhanced Lifeline support monthly and up to \$70 of expanded Link-Up support beyond current levels. An individual living on tribal lands may also qualify for Lifeline and Link-Up discounts if he or she participates in one of the above programs or one of the following federal programs: Bureau of Indian Affairs General Assistance or Tribally Administered Temporary Assistance to Needy Families. © 2009 CenturyLink.

Get connected.



Get telephone service for as little as \$1 per month with Lifeline and Link-Up assistance for Tribal Lands.

If you live on a federally-recognized Native American Tribal Land, take part in federal or state assistance programs, and have an income at or below 135% of the federal Poverty Guidelines, then you may qualify for residential telephone service and installation discounts under the Lifeline and Link-Up programs.

CenturyLink is committed to enhancing the lives of those around us in a meaningful way. We deliver leading technologies that keep people and businesses connected and enrich the communities we serve.

Call 1.800.366.8201 or visit www.centurylink.com/lifeline



CenturyLinkTM
Stronger ConnectedTM

Qualifying for Enhanced Lifeline and Link-Up Support on Tribal Lands

Subscribers living on tribal lands may be eligible for Enhanced Lifeline and Link-Up support if they have an income at or below 135% of the federal Poverty Guidelines, or if they participate in any of these additional assistance programs:

- Medicaid
- Supplemental Nutritional Assistance Program (SNAP or food stamps)
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance
- Low-Income Home Energy Assistance Program (LIHEAP)
- Temporary Assistance to Needy Families (TANF)
- The National School Lunch's Free Lunch Program
- Tribally-Administered Temporary Assistance for Needy Families (TTANF)
- Head Start (if income eligibility criteria are met)
- Tribal National School Lunch Program
- Bureau of Indian Affairs General Assistance

Enhanced Lifeline Assistance for tribal lands provides qualified telephone subscribers living on tribal lands with discounts of up to \$35 per month on basic monthly telephone service. As a result, depending on current rates, qualified subscribers on tribal lands may receive basic local phone service for as little as \$1 a month.

Link-Up Support for tribal lands provides qualified subscribers with a one-time discount on initial installation of a primary residential phone.

Call 1.800.366.8201 and request a Tribal Lands application or visit www.centurylink.com/lifeline.



CenturyLink™
Stronger Connected™

Lifeline and Link-Up are available to qualifying consumers in every U.S. state (territory and commonwealth). Qualifications for participation vary by state. States with their own programs have their own criteria. In states that rely solely on the federal program, the subscriber must participate in one of the following programs: Medicaid, food stamps, Supplemental Security Income (SSI), Federal Public Housing Assistance or the Low-Income Home Energy Assistance Program (LIHEAP), Head Start, the National School Lunch's Free Lunch Program, Temporary Assistance to Needy Families (TANF) or must have a Household annual gross income at or below 135% of the federal poverty level. The amount of the discounts also varies by state. Link-Up helps qualified low-income consumers to connect to the telephone network. This federal program offsets 1/2 of the initial hook-up fee, up to \$30, for qualified households. Residents of American Indian and Alaskan Native tribal lands may qualify for an additional \$25 of enhanced Lifeline support monthly and up to \$70 of expanded Link-Up support beyond current levels. An individual living on tribal lands may also qualify for Lifeline and Link-Up discounts if he or she participates in one of the above programs or one of the following federal programs: Bureau of Indian Affairs General Assistance or Tribally Administered Temporary Assistance to Needy Families. © 2009 CenturyLink.



Más formas de ahorrar

Obtenga un teléfono. Manténgase conectado. Ahorre dinero.

Lifeline y Link-Up: Ofreciendo la conexión telefónica que necesita

Si sus ingresos son limitados, con Lifeline y Link-Up puede ahorrar en una conexión telefónica. Estos programas de asistencia federal pueden ayudarlo a obtener una conexión telefónica y ahorrar en su servicio de teléfono local mensual.

CenturyLink está dedicada a mejorar de forma significativa las vidas de aquellas personas que nos rodean. Ofrecemos tecnologías líderes que mantienen conectadas a las personas y los negocios y enriquecen las comunidades a las que prestamos servicios.

Llame al 800.366.8201 o visite centurylink.com/lifeline



CenturyLink™
Mejor Conectados™

Conéctese con Link-Up. Comience a ahorrar en su factura de teléfono con Lifeline.

Si está inscrito en uno de estos programas, o cumple con estos criterios, puede reunir los requisitos para Lifeline y/o Link-Up:

- Medicaid
- Programa Suplementario de Asistencia Nutricional (Supplemental Nutritional Assistance Program [SNAP] o cupones canjeables por alimentos)
- Ingreso Seguridad Suplementario (Supplemental Security Income [SSI])
- Asistencia Federal para Vivienda Pública (Federal Public Housing Assistance)
- Programa de Asistencia Energética para Hogares de Bajos Ingresos (Low-Income Home Energy Assistance Program [LIHEAP])
- Head Start
- Programa Nacional del Almuerzo Escolar Gratuito (National School Lunch's Free Lunch Program)
- Asistencia Temporal a Familias Necesitadas (Temporary Assistance to Needy Families [TANF])
- Ingresos brutos domésticos anuales en o por debajo del 135% del nivel de pobreza federal

También es posible que reúna los requisitos para soporte técnico adicional mejorado de Lifeline y Link-Up si vive en tierras tribales de indios americanos o nativos de Alaska, y recibe soporte técnico de:

- Asistencia General de la Oficina de Asuntos de los Nativos Americanos (Bureau of Indian Affairs General Assistance)
- Asistencia Temporal a Familias Necesitadas Administrada a Nivel Tribal (Tribally Administered Temporary Assistance to Needy Families)

**Llame al 800.366.8201 o visite
centurylink.com/lifeline**



CenturyLink™
Mejor Conectados™

Lifeline y Link-Up están disponibles para los consumidores que reúnan los requisitos en todos los estados de los Estados Unidos (territorio y commonwealth). Los requisitos para la participación varían entre los estados. Los estados con sus propios programas cuentan con sus propios criterios. En los estados que dependen únicamente del programa federal, el suscriptor debe participar en uno de los siguientes programas: Medicaid, cupones canjeables por alimentos, Ingreso de Seguridad Suplementario (SSI), Asistencia Federal para Vivienda Pública o el Programa de Asistencia Energética para Hogares de Bajos Ingresos (LIHEAP), Head Start, el Programa Nacional del Almuerzo Escolar Gratuito, Asistencia Temporal a Familias Necesitadas (TANF) o debe tener un ingreso bruto anual doméstico en o por debajo del 135% del nivel de pobreza federal. El monto de los descuentos también varía entre los estados. Link-Up ayuda a los consumidores de bajos ingresos que reúnen los requisitos a conectarse con la red telefónica. Este programa federal compensa la mitad del cargo de conexión inicial, hasta \$30, a las familias que reúnen los requisitos. Los residentes de tierras tribales de indios americanos y nativos de Alaska pueden reunir los requisitos para obtener \$25 adicionales de soporte técnico mejorado de Lifeline mensual y hasta \$70 de soporte técnico extendido de Link-Up más allá de los niveles actuales. Una persona que viva en tierras tribales también puede reunir los requisitos para descuentos de Lifeline y Link-Up si participa en uno de los programas mencionados o uno de los siguientes programas federales: Asistencia General de la Oficina de Asuntos de Nativos Americanos o Asistencia Temporal a Familias Necesitadas Administrada a Nivel Tribal. © 2010 CenturyLink.

LLFY0210

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **COMMENTS OF CENTURYLINK** to be: 1) filed via ECFS with the Office of the Secretary of the FCC in WC Docket Nos. 11-42 and 03-109 and CC Docket No. 96-45; 2) served via e-mail on Ms. Kimberly Scardino (Kimberly.Scardino@fcc.gov) and Mr. Charles Tyler (Charles.Tyler@fcc.gov) of the Telecommunications Access Policy Division, Wireline Competition Bureau; and 3) served via e-mail on the FCC's duplicating contractor, Best Copy & Printing, Inc. at fcc@bcpiweb.com.

/s/ Richard Grozier

April 21, 2011